

MARC RODRIGUEZ, OSB No. 201019
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*Of Attorney for Defendants City of Portland
and Jason Worthington*

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

LAVONNE JORDAN,

PLAINTIFF,

v.

**CITY OF PORTLAND, JASON
WORTHINGTON, and JOHN DOE,**

DEFENDANTS.

Case No.: 3:22-CV-00942-HZ

**DEFENDANTS' OFFER OF JUDGMENT
TO PLAINTIFF, PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE
68**

TO PLAINTIFF LAVONNE JORDAN AND HER ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendants City of Portland and Jason Worthington ("Defendants") hereby offer to allow Plaintiff LaVonne Jordan ("Plaintiff") to take judgment against Defendants, pursuant to Federal Rule of Civil Procedure 68, as follows:

A judgment in favor of Plaintiff and against Defendants in the sum of Three Thousand Five Hundred Dollars and Zero Cents (\$3,500.00), plus reasonable attorneys' fees and costs to be determined and awarded by the Court.

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If Plaintiff does not accept this offer, pursuant to Federal Rule of Civil Procedure 68(d), she may become obligated to pay the City's costs incurred after the making of this offer if Plaintiff does not recover a final judgment that is more favorable than this offer of judgment.

To accept this offer, Plaintiff must serve the City with written notice of Plaintiff's acceptance thereof within fourteen (14) days from the date of service of this offer on Plaintiff.

This offer is not to be construed in any way as an admission of liability by the City, but rather is made solely for the purpose of compromising a disputed claim.

Dated: March 21, 2023

Respectfully submitted,

/s/ Marc Rodriguez

Marc Rodriguez, OSB No. 201019

Deputy City Attorney

Telephone: (503) 823-4047

*Of Attorney for Defendants City of Portland and
Jason Worthington*

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2023, I served or caused to be served a true and correct copy of the foregoing **DEFENDANTS' OFFER OF JUDGMENT TO PLAINTIFF,**
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68 on the interested parties in this action as follows:

Barry Fifth-Lince Clark Law & Associates, LLC 6501 SW Macadam Ave., Suite E Portland, OR 97239 E-mail: barry5thlince@gmail.com E-mail: barry@clarklawportland.com	<i>Of Attorneys for Plaintiff, LaVonne Jordan</i>
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- ☒ by **mail** in a sealed envelope, with postage fully prepaid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☐ by **facsimile transmission**.
- ☒ by **email** (courtesy copy).
- ☐ by **electronic service** via the Court's CM/ECF electronic filing system for registered users.

/s/ Marc Rodriguez

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